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May 3, 2019

HON. MARGARET M. CONGILOS-RUIZ, C.B.J.
Northern District of New York
James H. Hanley Federal Building
100 South Clinton Street, Room 315
P.O. Box 7008
Syracuse, New York 13261-7008

**RE: Centerstone Linen Services, LLC d/b/a Clarus Linen Systems, et al
Case No. 18-31754-5-mcr**

**RE: Atlas Health Care Linen Services Co., Inc. d/b/a CLarus Linen Systems
Case No. 18-31753-5-mcr**

Dear Judge Cangilos-Ruiz:

We are the attorneys for Catholic Health System, Inc., Mercy Hospital of Buffalo, Sisters of Charity Hospital of Buffalo, New York, Kenmore Mercy Hospital, and Mount St. Mary's Hospital of Niagara Falls (cumulatively, the "Catholic Hospitals"), in the above-referenced cases.

The purpose of this letter is to respectfully request, in an abundance of caution, that the Court not delete the date of May 9, 2019 on its calendar for the evidentiary hearing on the motions of the Catholic Hospitals.

Pursuant to the Court's Text Order of April 12, 2019, the motions of the Catholic Hospitals were adjourned to May 8, 2019, and the tentative evidentiary hearing was rescheduled for May 9, 2019.

On April 3, 2019, the Catholic Hospitals filed its Objection to the assumption and assignment of the laundry services agreements ("Agreements") that were the subject of their motions.

In its Response to that Objection, Debtor stated that it "does not anticipate seeking" the assumption of the Agreements. However, Debtor also stated, *inter alia*, that it would not consent to

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the rejection of the Agreements until after the closing of the sale of the Debtor's Buffalo assets and after the issuance of a scheduling order for litigation of Debtor's claims against the Catholic Hospitals.

At the hearing on May 8, 2019, the Catholic Hospitals will oppose Debtor's request to impose as conditions for the rejection of the Agreements the occurrence of the aforesaid events.

Accordingly, if the motions of the Catholic Hospitals are not granted at the hearing on May 8, then the Catholic Hospitals respectfully request that the evidentiary hearing concerning their motions go forward on May 9 as already scheduled.

We have transmitted this letter in an abundance of caution so that the Court would not consider a change in its calendar, based on Debtor's Response, without first being apprised of the Catholic Hospitals' position concerning same.

We thank the Court very much for its patience and courtesy in this matter.

Respectfully,

MELVIN & MELVIN, PLLC

By: 

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LL/ksd

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